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Attorneys for BLUE CROSS OF
CALIFORNIA D/B/A ANTHEM BLUE
CROSS AND ANTHEM BLUE CROSS
LIFE AND HEALTH INSURANCE
COMPANY

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SUNRISE HOSPITAL AND MEDICAL
CENTER, LLC; SUNRISE
MOUNTAINVIEW HOSPITAL, INC.; and
SOUTHERN HILLS MEDICAL CENTER,
LLC,

Plaintiffs,

v.

BLUE CROSS OF CALIFORNIA D/B/A
ANTHEM BLUE CROSS; ANTHEM BLUE
CROSS LIFE AND HEALTH INSURANCE
COMPANY; and KEENAN &
ASSOCIATES, INC.,

Defendants.

Case No. 2:23-cv-01986-APG-EJY

**DEFENDANTS' UNOPPOSED MOTION
FOR EXTENSION OF TIME TO MOVE,
ANSWER OR OTHERWISE RESPOND
TO PLAINTIFFS' FIRST AMENDED
COMPLAINT
(FIRST REQUEST)**

1 Pursuant to LR IA 6-1 and 6-2, Defendants Blue Cross of California d/b/a Anthem Blue
2 Cross and Anthem Blue Cross Life and Health Insurance Company respectfully move the Court
3 for a 21-day extension of time to move, answer or otherwise respond to Plaintiffs' First Amended
4 Complaint in the above referenced matter from February 8, 2024 until and through February 29,
5 2024.

6 Plaintiffs' First Amended Complaint adding Defendants to this lawsuit was filed on January
7 4, 2024. [ECF No. 14]. Defendants were served on January 18, 2024; therefore, Defendants'
8 deadline to move, answer or otherwise respond to Plaintiffs' First Amended Complaint is February
9 8, 2024. As such, this request for extension is being made before the expiration of the specified
10 period pursuant to the local rules.

11 This extension is being requested because additional time is needed to fully evaluate the
12 allegations in the First Amended Complaint and to formulate a response.

13 Therefore, Defendants request a 21-day extension from February 8, 2024 through and until
14 February 29, 2024 to answer, move or otherwise respond to Plaintiff's First Amended Complaint.

15 This is Defendants' first request for an extension of time in this matter.

16 This Motion is not for delay, but so that justice may be done. The extension of time will in
17 no way prejudice any party, as there is no scheduling order or other deadlines set in this case to
18 date.

19 Counsel for Plaintiffs has advised that Plaintiffs are not opposed to the relief sought by way
20 of this Motion.

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1 WHEREFORE, Defendants Blue Cross of California d/b/a Anthem Blue Cross and Anthem
2 Blue Cross Life and Health Insurance Company respectfully request that the Court grant their
3 Motion for Extension of Time to Move, Answer or Otherwise Respond to the First Amended
4 Complaint.

5 DATED this 7th day of February 2024.

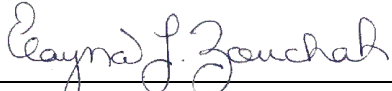
6 Respectfully submitted,

7 PRHLAW LLC

8 By: Charles H. McCrea
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18 **IT IS SO ORDERED:**

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UNITED STATES MAGISTRATE JUDGE

21 DATED: February 7, 2024
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